

EXHIBIT 7

From: [Kristopher Davis](#)
To: [Nicholas Mathews](#)
Cc: [Clare Churchman](#); rak_headwater@raklaw.com; [ATT Headwater](#); Ddacus@dacusfirm.com; [Melissa Kalka](#)
Subject: Re: Headwater/AT&T: Discovery and Correspondence
Date: Friday, February 2, 2024 11:33:36 AM

Nick,

Following up on our discussion of asserted claim and prior art narrowing, please find below Headwater's proposal:

1. No later than 14 days after submission of the parties' Joint Claim Construction Statement, Headwater would serve its First Election of Asserted Claims, identifying no more than 128 total asserted claims across all patents.
2. No later than 14 days after Headwater's First Election, AT&T would serve its First Election of Prior Art, identifying no more than 64 total references across all patents.
3. No later than 28 days before the service of opening expert reports, Headwater would serve its Second Election of Asserted Claims, identifying no more than 64 total asserted claims across all patents.
4. No later than 28 days after Headwater's Second Election, AT&T would serve its Second Election of Prior Art, identifying no more than 32 total references across all patents.

Regards,
Kris

Kristopher Davis
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
(310) 826-7474
kdavis@raklaw.com

On Jan 30, 2024, at 9:53 AM, Kristopher Davis <kdavis@raklaw.com> wrote:

Nick,

2:00 pm CT today works for us. Talk to you then.

Regards,
Kris

Kristopher Davis
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
(310) 826-7474
kdavis@raklaw.com

On Jan 29, 2024, at 2:48 PM, Nicholas Mathews
<nmathews@McKoolSmith.com> wrote:

Hi Kris -- looks like we weren't able to connect on Friday. I'm going to send you an invite for 2p central time tomorrow, but please let me know if another time works better. And please feel free to forward the invite to anyone else on your side who should be participating. Thanks, Nick

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From: Nicholas Mathews <nmathews@McKoolSmith.com>
Sent: Thursday, January 25, 2024 7:03 PM
To: Kristopher Davis <kdavis@raklaw.com>
Cc: Clare Churchman <cchurchman@mckoolsmith.com>;
rak_headwater@raklaw.com <rak_headwater@raklaw.com>;
ATT_Headwater <ATT_Headwater@mckoolsmith.com>;
Ddacus@dacusfirm.com <Ddacus@dacusfirm.com>; Melissa Kalka
<mkalka@McKoolSmith.com>
Subject: Re: Headwater/AT&T: Discovery and Correspondence

Yes.

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McKool Smith | Nicholas Mathews
Principal | Dallas | (214) 978-4914

From: Kristopher Davis <kdavis@raklaw.com>
Sent: Thursday, January 25, 2024 6:17 PM
To: Nicholas Mathews <nmathews@McKoolSmith.com>
Cc: Clare Churchman <cchurchman@mckoolsmith.com>;
rak_headwater@raklaw.com <rak_headwater@raklaw.com>;
ATT_Headwater <ATT_Headwater@mckoolsmith.com>;
Ddacus@dacusfirm.com <Ddacus@dacusfirm.com>; Melissa Kalka
<mkalka@McKoolSmith.com>
Subject: Re: Headwater/AT&T: Discovery and Correspondence

Nick,

Are you available tomorrow at 3:00 pm CT / 1:00 pm PT to discuss?

Regards,
Kris

Kristopher Davis
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
(310) 826-7474
kdavis@raklaw.com

On Jan 25, 2024, at 9:43 AM, Nicholas Mathews
<nmathews@McKoolSmith.com> wrote:

Counsel – Please let me know your availability to meet and confer on claim narrowing later this afternoon or tomorrow. If we can't reach agreement soon on meaningful claim narrowing we intend to move forward with a motion. Thanks,
Nick

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From: Clare Churchman <cchurchman@mckoolsmith.com>
Sent: Monday, January 22, 2024 3:17 PM
To: rak_headwater@raklaw.com
Cc: ATT_Headwater <ATT_Headwater@mckoolsmith.com>;
Ddacus@dacusfirm.com; Melissa Kalka
<mkalka@McKoolSmith.com>
Subject: RE: Headwater/AT&T: Discovery and Correspondence

Counsel,

Following up on this correspondence. Please let us know if you are amenable to the proposed approach to narrowing this case.

Best,

McKool Smith | Clare Churchman
Associate | Dallas | [\(214\) 978-6336](tel:(214)978-6336)

From: Melissa Kalka <mkalka@McKoolSmith.com>
Sent: Friday, January 12, 2024 6:21 PM
To: rak_headwater@raklaw.com
Cc: ATT_Headwater
<ATT_Headwater@mckoolsmith.com>; Ddacus@dacusfirm.com
Subject: Headwater/AT&T: Discovery and Correspondence

Counsel,

Please see attached:

1. AT&T's First set of Interrogatories to Headwater (Nos. 1-18).
2. AT&T's First Request for Production of Documents
3. Letter from Nick Mathews

Best regards,

McKool Smith | Melissa Kalka
Senior Paralegal | Dallas | [\(214\) 978-6394](tel:(214)978-6394)